

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Larvence Peart  
**Debtor 1**  
Nicole Yolanda Peart  
**Debtor 2**

**Chapter 13**  
**Case No. 1:18-BK-00320-HWV**  
**Matter:** Motion for Termination of Wage Attachment Order

**MOTION FOR TERMINATION OF WAGE ATTACHMENT ORDER**

AND NOW, come the Debtor(s), Larvence Peart & Nicole Yolanda Peart, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion for Termination of Wage Attachment Order and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about January 29, 2018.
- 2) Debtor 2 receives regular income from employment with Changes Healthcare which has been attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan.
- 3) Debtor 2 wishes to terminate this wage attachment.

WHEREFORE, Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to cease immediately this wage attachment to the Standing Chapter 13 Trustee.

Respectfully submitted,

Date: August 15, 2022

/s/ Nicole Yolanda Peart

Debtor 2

**DETHLEFS PYKOSH & MURPHY**

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
PA ID No. 201207  
2132 Market Street  
Camp Hill, PA 17011  
(717) 975-9446  
pmurphy@dplglaw.com  
*Attorney for Debtor(s)*

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**ORDER OF COURT**

UPON CONSIDERATION of the above-referenced Debtor(s)' Motion for Termination of Wage Attachment Order, IT IS  
HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor 2 receives income should  
immediately cease the wage attachment in the amount of **\$842.77** from each **bi-weekly** paycheck.

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**CERTIFICATE OF SERVICE**

I hereby certify that on Monday, August 15, 2022, I served a true and correct copy of the **Debtor(s)' Motion for Termination of Wage Attachment Order and proposed Order** in this proceeding upon the following:

Via USPS First Class Mail  
Changes Healthcare  
Attn: Payroll Department  
3055 Lebanon Pike, Suite 1000  
Nashville, TN 37214

Via Electronic Means  
Jack H. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Suite 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire